

INSTRUCTION NO. 32

In determining the amount of punitive damages, you should consider all of the attendant circumstances, including the nature, extent and enormity of the wrong, the intent of the party committing it, the amount allowed as actual damages, and, generally, all of the circumstances attending the particular act involved, including any circumstances which may operate to reduce without wholly defeating punitive damages.

Punitive damages should be of such an amount as will deter the defendant from and warn others against similar acts of misconduct. Thus, the wealth of the defendant is a fact to be considered by you in determining the amount of punitive damages.

FILED

FEB 27 2014

Clerk, U.S. District Court
District Of Montana
Billings

INSTRUCTION NO. 33

An award for punitive damages may not exceed \$10 million or 3% of a defendant's net worth, whichever is less. GEICO's net worth is \$2,097,653,958.